

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GAMAL ABDELAZIZ, JOHN WILSON,

Defendants

No. 19-CR-10080-NMG

**JOINT MOTION FOR STAY OF SURRENDER DATES  
AND BRIEFING SCHEDULE REGARDING BAIL PENDING APPEAL**

The government and defendants Gamal Abdelaziz and John Wilson (collectively, “the Parties”) hereby jointly move for the Court to enter an Order staying the defendants’ surrender dates pending the Court’s resolution — and if necessary, the First Circuit’s resolution — of the defendants’ forthcoming motions for bail pending appeal of their convictions and sentences. The Parties also jointly move for the Court to enter an Order adopting the Parties’ proposed briefing schedule for the defendants’ motions for bail pending appeal. In support of this joint motion, the Parties state as follows:

1. During the four-week trial in this case, the Court admitted nearly 250 exhibits, and 17 witnesses testified. The trial transcript is more than 3,000 pages.
2. Defendant Abdelaziz’s sentencing is scheduled for February 9, 2022. Defendant Wilson’s sentencing is scheduled for February 16, 2022.
3. The defendants intend to file motions for bail pending appeal of their convictions and sentences pursuant to 18 U.S.C. § 3143(b). The government will oppose those motions. If the Court denies the defendants’ motions for bail pending appeal, the defendants intend to seek relief from the First Circuit.

4. The Parties agree that under the circumstances of this case, the defendants' surrender dates to begin their sentences should be stayed until their motions for bail pending appeal are resolved by the Court, and if denied, decided by the First Circuit.

5. The Parties also agree that in order to adequately present the issues relevant to bail pending appeal under the circumstances of this case in an orderly fashion, an extended briefing schedule is warranted.

6. Accordingly, the Parties respectfully request that the briefing and any hearings regarding bail pending appeal for defendants Abdelaziz and Wilson be consolidated on the same proposed schedule, as follows. The defendants will file their motions for bail pending appeal before this Court on March 18, 2022 (30 days from the date of defendant Wilson's sentencing). The government will file its consolidated opposition on April 18, 2022. The defendants will file their reply briefs, if any, on May 2, 2022.

7. The Parties request that the Court stay the defendants' surrender dates until six weeks after the issue of bail pending appeal is decided, including, if necessary, by the First Circuit. If the Court denies the defendants' motions and if the First Circuit denies relief, the government will file a notice so advising the Court, and the defendants agree to self-surrender to institutions designated by the Bureau of Prisons six weeks after the First Circuit issues its decision regarding bail pending appeal, provided, however, that the defendants reserve their right to seek further judicial relief.

Accordingly, the Parties jointly request that the Court grant this motion and enter the Proposed Order attached hereto.

RACHAEL S. ROLLINS  
United States Attorney

Respectfully submitted,

GAMAL ABDELAZIZ  
Defendant

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